

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

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IN RE TAKE-TWO INTERACTIVE  
 SECURITIES LITIGATION ) No. 1:06-cv-00803-RJS  
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**LEAD PLAINTIFFS' UNOPPOSED MOTION TO AUTHORIZE  
 DISTRIBUTION OF NET SETTLEMENT FUND**

Lead Plaintiffs the New York City Employees' Retirement System, the New York City Police Pension Fund, the New York City Fire Department Pension Fund (collectively, "Lead Plaintiffs") and the State-Boston Retirement System (together with Lead Plaintiffs, "Plaintiffs"), on behalf of the Class, respectfully move for an Order pursuant to Rule 23 of the Federal Rules of Civil Procedure, authorizing, *inter alia*: (i) distribution of the Net Settlement Fund established by the settlement of the action to Authorized Claimants; (ii) the Claims Administrator to deem timely, otherwise eligible claims that were submitted after the September 21, 2010 claims filing deadline, but received on or before April 15, 2011; (iii) payment of outstanding fees charged and expenses incurred by the Claims Administrator in the amount of \$436,301.62; (iv) payment of the balance of the attorneys' fees and expenses awarded to Lead Counsel, but withheld pending distribution of the Net Settlement Fund to the Class; (v) the Claims Administrator to reallocate to Authorized Claimants (including late claimants approved by the Court) any residual funds remaining (whether by reason of tax refunds, uncashed checks, or otherwise), provided such reallocation is economical, and thereafter to donate any remaining balance to a private, nonsectarian, not-for-profit organization; and (vi) the destruction of copies of Proofs of Claim, and all related paper documentation, after distribution of the Net Settlement Fund is completed.

In support of this motion, Lead Plaintiffs rely on the Memorandum of Law, the Declaration of Jonathan M. Plasse, with annexed exhibits, and the Affidavit of Michelle M. La Count, Esq., with annexed exhibits, each of which is filed herewith, and all prior proceedings in this action.

A proposed Order is filed herewith for the Court's consideration.

Dated: New York, New York  
July 6, 2011

Respectfully submitted,

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